

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

---

KAYLA B. ZUCKER, an individual; on behalf  
of herself and all others similarly situated,

x  
CASE NO. 13-CV-2674 (JS)(AKT)

Plaintiff,

vs.

PORTECK GLOBAL SERVICES, INC. a/k/a  
PORTECK GLOBAL SERVICE, INC. a/k/a  
ALL PURPOSE SERVICE, INC. d/b/a  
PORTECK GLOBAL SERVICES,  
and JOHN AND JANE DOES NUMBERS 1  
THROUGH 50, BEING FICTITIOUS NAMES  
OF UNIDENTIFIED PERSONS WHO  
CONTROL THE POLICIES AND  
PRACTICES INVOKED BY PORTECK  
GLOBAL SERVIECS, INC. a/k/a PORTECK  
GLOBAL SERVICE, INC. a/k/a  
ALL PURPOSE SERVICE, INC. d/b/a  
PORTECK GLOBAL SERVICES and  
ARVIND WALIA,

Defendants.

x

**NOTICE OF MOTION**

TO THE CLERK OF THE COURT:

Please take notice that the Plaintiff named in the above-entitled action move this Court  
pursuant to Fed. R. Civ. P. 15(a)(2) for an Order granting to the Plaintiff leave to file a second  
Amended Complaint. The Plaintiff will rely upon all of the pleadings and proceeding which have  
occurred in the above-entitled action together with the Memorandum of Law submitted herewith.

DATED: September 2, 2014

/ s / Robert L. Arleo  
ROBERT L. ARLEO, ESQ.  
Attorney for the Plaintiff  
380 Lexington Avenue, 17<sup>th</sup> Fl.  
New York, New York 10168  
(212) 551-1115  
Email: r.arleo@verizon.net